

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE



RENEE M. BUTZ,

Plaintiff,

v.

LAWNS UNLIMITED LTD. and
EDWARD FLEMING,

Defendants.

Civ. No. 05-495-JJF
Judge Joseph J. Farnan Jr.

**PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION FOR EXTENSION OF
TIME TO COMPLETE DISCOVERY**

Plaintiff, hereby requests that the Defendants' request for an extension of the June 1, 2007 discovery cut-off and modification of the case scheduling order not be granted for the reasons that follow:

1. Plaintiff has provided answers and documentation requested by Defendant's attorney.
2. Plaintiff filed the Complaint within the statute of limitations.
3. Plaintiff provided all related and supporting documentation with the initial Complaint and Disclosures.
4. Plaintiff has been unable to schedule deposition of the Defendant after several attempts and believes that Defendant will not make himself available for deposition in the future.
5. Plaintiff is prepared for immediate mediation.

A handwritten signature in cursive script, appearing to read "Renee Bulz", written over a horizontal line.

Renee M. Bulz
58 Hickory Drive
North East, MD 21901
(410) 441-4300
Plaintiff pro se

Dated: 6/13/07

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiff's Response to Defendant's Motion for Extension of Time to Complete Discovery were sent by first-class United States mail, postage duly paid, on this 13 day of June, 2007, to
counsel of record as follows:

Margaret D. DiBianca
Young Conaway Stargatt & Taylor, LLP
The Brandywine Building, 17th Floor
1000 West Street
Wilmington, DE 19801-0391



Renee M. Butz
58 Hickory Drive
North East, MD 21901
(410) 441-4300
Plaintiff pro se

Dated: 6/13/07

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Reene Butz
58 Hickory Dr
North East MD 21901

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